

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE COMMISSION,)
Plaintiff,)
v.) Case No. 1:14 CV 11858-NMG
TELEXFREE, INC.,)
TELEXFREE LLC,)
JAMES M. MERRILL,)
CARLOS N. WANZELER,)
STEVEN M. LABRIOLA,)
JOSEPH H. CRAFT,)
SANDERLEY RODRIGUES DE VASCONCELOS,)
SANTIAGO DE LA ROSA,)
RANDY N. CROSBY and)
FAITH R. SLOAN,)
Defendants,)
and)
TELEXFREE FINANCIAL, INC.,)
TELEXELECTRIC, LLC and)
TELEX MOBILE HOLDINGS, INC.,)
Relief Defendants.)

**JOINT MOTION FOR ENTRY OF CONSENT ORDER
AS TO DEFENDANT STEVEN LABRIOLA**

Plaintiff Securities and Exchange Commission (“the Commission”) and defendant Steven M. Labriola (“Labriola”) hereby move this Court to enter the agreed-to Consent Order in the form attached hereto as Exhibit A. The parties have agreed to the order in an effort to preserve the status quo pending further determination by this Court of the merits of this case.

CONCLUSION

For the foregoing reasons, the undersigned parties respectfully request that their motion be granted.

Respectfully submitted,

**SECURITIES AND EXCHANGE
COMMISSION**

By its attorneys

/s/ Frank C. Huntington

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Dated: May 9, 2014

Respectfully submitted,

DEFENDANT STEVEN M. LABRIOLA

By its attorneys

/s/ Denis M. King

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CERTIFICATE OF SERVICE

I certify that this document was served through the ECF system and paper copies will be sent to those indicated as non-registered participants. In particular, copies were sent by UPS as follows:

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